

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WISCONSIN

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ONE WISCONSIN INSTITUTE, INC.,  
CITIZEN ACTION OF WISCONSIN EDUCATION  
FUND, INC., RENEE M.  
GAGNER, ANITA JOHNSON,  
CODY R. NELSON, JENNIFER S. TASSE,  
SCOTT T. TRINDL, MICHAEL R. WILDER,  
JOHNNY M. RANDLE, DAVID WALKER  
DAVID APONTE, and CASSANDRA M.  
SILAS,

Plaintiffs,

v.

15-cv-324-jdp

MARK L. THOMSEN, ANN S. JACOBS,  
BEVERLY R. GILL, JULIE M. GLANCEY,  
STEVE KING, DON M. MILLS, MICHAEL  
HAAS, MARK GOTTLIEB, and  
KRISTINA BOARDMAN,  
*all in their official capacities,*

Defendants.

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JUSTIN LUFT, et al.,  
on behalf of themselves and all others similarly  
situated,

Plaintiffs,

v.

20-cv-768-jdp

TONY EVERS, et al.,

Defendants.

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**DECLARATION OF SELBY P. BROWN, ESQ. IN SUPPORT OF *LUFT* PLAINTIFFS'  
MOTION FOR A PRELIMINARY INJUNCTION**

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I, Selby P. Brown, Esq., declare as follows:

1. I am an attorney at law licensed to practice law in Pennsylvania. I am an attorney at Dechert LLP, counsel of record for Plaintiffs. I submit this declaration in support of *Luft* Plaintiffs' Motion for a Preliminary Injunction. Unless otherwise stated, I have personal knowledge of all matters stated herein and would competently testify thereto if called upon as a witness.

2. Attached hereto as **Exhibit 1** is a true and correct copy of the Case Activity Report of [REDACTED], produced by Defendants and beginning with Bates stamp DEF-DMV102956.

3. Attached hereto as **Exhibit 2** is a true and correct copy of the Case Activity Report of [REDACTED], produced by Defendants and beginning with Bates stamp DEF-DMV210048.

4. Attached hereto as **Exhibit 3** is a true and correct copy of the Case Activity Report of [REDACTED], produced by Defendants and beginning with Bates stamp DEF-DMV087725.

5. Attached hereto as **Exhibit 4** is a true and correct copy of the Case Activity Report of [REDACTED], produced by Defendants and beginning with Bates stamp DEF-DMV003994.

6. Attached hereto as **Exhibit 5** is a true and correct copy of the Case Activity Report of [REDACTED], produced by Defendants and beginning with Bates stamp DEF-DMV215550.

7. Attached hereto as **Exhibit 6** is a true and correct copy of the Case Activity Report of [REDACTED], produced by Defendants and beginning with Bates stamp DEF-DMV012639.

8. Attached hereto as **Exhibit 7** is a true and correct copy of the Case Activity Report of [REDACTED], produced by Defendants and beginning with Bates stamp DEF-DMV211794.

9. Attached hereto as **Exhibit 8** is a true and correct copy of the Case Activity Report of [REDACTED], produced by Defendants and beginning with Bates stamp DEF-DMV205585.

10. Attached hereto as **Exhibit 9** is a true and correct copy of the Case Activity Report of [REDACTED], produced by Defendants and beginning with Bates stamp DEF-DMV022212.

11. Attached hereto as **Exhibit 10** is a true and correct copy of the Case Activity Report of [REDACTED], produced by Defendants and beginning with Bates stamp DEF-DMV030830.

12. Attached hereto as **Exhibit 11** is a true and correct copy of the Case Activity Report of [REDACTED], produced by Defendants and beginning with Bates stamp DEF-DMV243063.

13. Attached hereto as **Exhibit 12** is a true and correct copy of the Case Activity Report of [REDACTED], produced by Defendants and beginning with Bates stamp DEF-DMV197686.

14. Attached hereto as **Exhibit 13** is a true and correct copy of the Case Activity Report of [REDACTED], produced by Defendants and beginning with Bates stamp DEF-DMV002767.

15. Attached hereto as **Exhibit 14** is a true and correct copy of the Case Activity Report of [REDACTED] produced by Defendants and beginning with Bates stamp DEF-DMV214021.

16. Attached hereto as **Exhibit 15** is a true and correct copy of the Case Activity Report of [REDACTED] produced by Defendants and beginning with Bates stamp DEF-DMV245073.

17. Attached hereto as **Exhibit 16** is a true and correct copy of the Case Activity Report of [REDACTED], produced by Defendants and beginning with Bates stamp DEF-DMV206653.

18. Attached hereto as **Exhibit 17** is a true and correct copy of the Case Activity Report of [REDACTED], produced by Defendants and beginning with Bates stamp DEF-DMV069112.

19. Attached hereto as **Exhibit 18** is a true and correct copy of the Case Activity Report of [REDACTED], produced by Defendants and beginning with Bates stamp DEF-DMV216585.

20. Attached hereto as **Exhibit 19** is a true and correct copy of the letter to [REDACTED] [REDACTED] from the Wisconsin Department of Motor Vehicles, dated September 12, 2019, produced by Defendants and beginning with Bates stamp DEF-DMV146807.

I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing statements are true and correct to the best of my knowledge and belief.

Executed this 18<sup>th</sup> day of September 2020  
at Philadelphia, PA

/s/ Selby P. Brown  
Selby Brown